

Municipality/Organization: Town of Milford, MA

Permit Number: MAR041135

**Annual Report Number
& Reporting Period:** No. 4: March 06-March 07

NPDES Phase II Small MS4 General Permit Annual Report


Part I. General Information

Contact Person: Shelly A. Leclaire **Title:** Highway Surveyor

Telephone #: 508-473-1274 **Email:** Highway@MilfordMa.com

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

Printed Name: Shelly A. Leclaire

Title: Highway Surveyor

Date: April 10, 2007

Part II. Self-Assessment

The Town of Milford has completed the required self-assessment and has determined that our municipality is in compliance with the permit conditions. Discussions of the progress on BMPs toward the measurable goals, as well as quantification of some of the programs, are included in the following sections.

Public Education and Outreach

Milford has met the goals of the BMPs in this category and will continue to provide public education in the form of presentations, expansion of collection of stormwater materials in the local library and other Town venues (schools, Town Hall), and postings on the Town website. During this permit year, a general stormwater education presentation was made to the Milford Industrial Development Commission. Stormwater education materials were distributed to 6 Milford Schools, as well as the Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall. Electronic files of these materials were programmed into the Town of Milford web site. An EPA Poster to inform contractors about the NPDES stormwater permit program was posted in the Town Planning and Engineering office and brochures were made available for contractors/developers not aware of the program. During Permit Year 5, public education will focus on the issue of waterfowl feeding at Town parks and other potential sources of bacteria in the watershed.

Public Involvement and Participation

Annual clean-ups, scrap metal and used motor oil recycling, and semi-annual hazardous waste pickup days are ongoing programs to fulfill this component. The “Godfrey Brook Feasibility Study” was presented to the Milford Board of Selectmen on March 26, 2007. This presentation, which was televised on a local access cable channel, explained the existing condition of the stone-masonry channelized sections of Godfrey, O’Brien and Hospital Brooks and how frequent collapse of the deteriorated stone walls results in negative water quality impacts. Alternative solutions and recommendations for rehabilitation of the channels were also presented.

Illicit Discharge Detection and Elimination (IDDE)

Town storm drain mapping was expanded with GPS location of additional storm sewer elements associated with 17 outfall systems including approximately 150 storm sewer manholes, 410 catch basins, and 60,000 feet of storm sewer pipes. The complete storm drain systems associated with 4 high priority outfalls were also mapped by March 16, 2006.

A letter was sent to one private property owner with notification of a potential illicit discharge from a private drain associated with the property, instructing the owner of his responsibility for removing the discharge. Since that time, the building has been completely renovated, altering its use from a hockey ice rink to a bowling alley. The drain, which was likely associated with the ice rink drainage system, has not been observed to be flowing since the renovation. Therefore, the Town has concluded that this illicit discharge has been removed as a result of the renovation.

During mapping of the system associated with high priority outfall #69 on March 15, 2006, the odor of petroleum was noted in some of the manholes that were opened to investigate system connections. A structure containing a substance which appeared to be oil was located upgradient of this storm drain system, although it did not appear to be directly connected to the storm drain system. Further research indicated that the property containing the structure is under Phase III of the MCP process and no further action was required by the Town.

The storm sewer systems associated with Outfalls #153, #148 and #170 were observed on April 28, 2006 for implementation of the Charles River IDDE Protocol ("top-down" approach) for illicit discharge detection. Almost every manhole that was observed within these three systems held standing or flowing water. Samples were collected from each of the manholes, and in all cases testing indicated that the water was likely from a natural source (groundwater). These results were consistent with commonly observed high groundwater levels in the Town of Milford, but did not narrow down the source(s) of the potential illicit discharges observed during the dry-weather outfall investigation previously conducted in 2004-2005 for the first phase of the IDDE Program. On June 13, 2006, 10 structures within the system associated with outfall #69 were observed. Each structure contained standing or flowing water and testing detected no indicators above threshold concentrations. It was decided to postpone any further investigations to August when dry-weather conditions would be expected and the chances for groundwater to be in the storm drains would be lower. The "top-down" approach was attempted a second time for outfall #170 on August 14, 2006. Although sandbags were placed, rain on the following day resulted in cancellation of testing. No further attempts at the "top-down" approach were made before winter due to the lack of occurrences of 4 continuous days of dry-weather required for this method.

While performing field mapping of the Town of Milford's storm sewer system on November 15, 2006, a likely illegal discharge into the storm sewer system was observed. At approximately 1:00 PM, the catch basin in front of #146 Congress Street was opened for field observation and field crew witnessed flow discharging into the catch basin on its western side. The flow discharged at a moderate rate and stopped suddenly during observation. An obvious odor of soap/detergent was noted, suggesting that the discharge consisted of washwater. The discharge into the catch basin was coming from the direction of the property at #146 Congress Street, with no other likely sources in the vicinity. The Town has sent a letter to the property owner, notifying him/her of the probable illegal connection and will assist the property owner with location of the source. The property owner will be required to remove the illegal connection in accordance with the Town's Stormwater Management By-law.

The Town has cooperated with Charles River Watershed Authority (CRWA) regarding water quality data collected by CRWA within the Town. CRWA has provided to the Town a summary of the data collected during the summer of 2006 along with sampling locations. One of the areas of concern identified by CRWA is the Charles River at Central Street. Samples collected by CRWA at this location indicated elevated bacteria levels. The Town has performed a visual inspection of the culvert and has noted excessive sedimentation within and downstream of the culvert which may be contributing to stagnation and backflow. During Permit Year 5, the Town intends to investigate the feasibility of clearing the culvert and downstream channel of sediment, which would reduce stagnation

that may contribute to the proliferation of bacteria. In addition, the Town will investigate the culvert with a camera in an attempt to locate any illegal connections or other sources of bacteria. A water quality testing component may be included with this investigation if funding allows.

Stormdrain system mapping will continue in Permit Year 5, as well as the IDDE program.

In addition to the stormwater IDDE program, the Milford Sewer Department has been and is continually detecting and removing illegal cross connections and making repairs to the sanitary sewer system. During 2006, the Sewer Department conducted smoke testing (290,000 linear feet), closed circuit television investigations (34,800 linear feet), building inspections and flow isolation within the sewer collection system. In addition, over 100 sewer manholes were inspected and repaired, and a direct connection from the MS4 to the sewer system was removed. This work is part of an effort to remove sources of infiltration/inflow (I/I) to the sewer system that occurs during high groundwater conditions. Currently, excessive I/I during heavy rains and/or snowmelt coincident with high groundwater levels, including inflow from illegal stormwater system connections to the sewer system, results in the surcharging of sewer lines at various locations. These surcharges cause manhole covers to pop open and raw sewage escapes into the MS4 and eventually flows to receiving water bodies. During 2007, work to isolate flows from the sewer system will begin. This work will significantly improve water quality.

Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment

The Milford Stormwater Management General By-Law, which is now fully in place, applies to all flows entering the MS4 generated on any developed and undeveloped lands within the Town, and requires approval of a stormwater management permit prior to the issuance of any building permit for development with construction activities disturbing greater than one acre for any project not already required to file a Notice of Intent (NOI) with the Milford Conservation Commission. Applications for NOIs with the Conservation Commission must include a fully executed Stormwater Management Form and stormwater systems must be designed in full compliance with DEP's Stormwater Management Policy. Application for the stormwater management permit under the Stormwater Management General By-Law includes development of a Stormwater Management and Erosion and Sediment Control Plan, as well as an Operation, Maintenance, and Inspection Agreement for BMPs to be constructed on-site. Minimum stormwater management performance standards required by the by-law will minimize the loss of annual recharge to groundwater, as follows:

“Stormwater management measures shall be required to satisfy the minimum control requirements and shall be implemented in the following order of preference:

- a. Infiltration, flow attenuation, and pollutant removal of runoff on-site to existing areas with grass, trees, and similar vegetation and through the use of open vegetated swales and natural depressions;
- b. Stormwater detention structures for the temporary storage of runoff which is designed so as not to create a permanent pool of water; and
- c. Stormwater retention structures for the permanent storage of runoff by means of a permanent pool of water.

Infiltration practices shall be utilized to reduce runoff volume increases. A combination of successive practices may be used to achieve the applicable minimum control requirements. Justification shall be provided by the applicant for BMP selection based on site conditions.

Best Management Practices shall be employed to minimize pollutants in stormwater runoff.

All stormwater management facilities shall be designed to provide an emergency overflow system, and incorporate measures to provide a non-erosive velocity of flow along its length and at any outfall.

The designed release rate of any stormwater structure shall be modified if any increase in flooding or stream channel erosion would result at any downstream point.”

During this Permit Year, there were four (4) proposed development projects including land disturbance over one acre which filed Notices of Intent with the Milford Conservation Commission and were issued Orders of Conditions and thus did not have to apply for Stormwater Management permits. All four (4) projects submitted Operation and Maintenance Plans which are now on file in the Town of Milford’s Office of Planning and Engineering. All new detention/stormwater basins for these projects will be added to the Town’s inventory of basin maintenance at the time of public acceptance of the streets.

Pollution Prevention and Good Housekeeping in Municipal Operations

The Town approved \$50,000 on 2/13/06 for the planning, design and permitting of retrofit BMPs for outfalls discharging to Milford Pond. These BMPs will include several hydrodynamic separation units and a stormwater treatment basin and will result in the reduction of sediments and nutrients (pollutants of concern) entering Milford Pond. The BMPs installed in these systems near their outfalls into Milford Pond will prevent additional sediments from re-filling the pond. The improvements to Milford Pond will likely have a positive downstream impact in the Charles River as well. Please review the previous annual report for more information concerning this project, which is currently in the design phase.

The drainage system leading to one outfall to the Charles River (downstream of the Milford Pond dam) was re-configured with the installation of a Stormceptor oil and particle separator.

A feasibility study for the repair and long term maintenance of the stone masonry channelized sections of Godfrey and O’Brien Brooks was completed in March 2007. Frequent damage to the aged stone walls results from high flows and contributes to periodic episodes of sediment loading from erosion. The “Godfrey Brook Feasibility Study” was presented to the Milford Board of Selectmen on March 26, 2007. The Milford Board of Selectmen has embraced the recommendations of the feasibility report and is taking active steps towards a design and construction program.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
PE1	Brochures to educate public about stormwater pollution, pollution prevention, importance of reporting illicit dumping	Highway Dept.	Develop brochures in Permit Year (PY) 1. Produce and mail to residents in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					
PE2	Brochures to educate business/industry regarding pollution prevention, material storage and handling, housekeeping, disposal practices	Highway Dept.	Develop brochure in PY1. Produce and mail to businesses in PY2.	Brochures distributed during PY2. Approximate volume of material removed from catch basins: PY2: 2,400 cubic yards (1598 tons of road sand were purchased by the Town during the previous winter season) PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)	Monitor goal of reduction in pollutants in catch basins, observed by catch basin cleaning crews.
Revised					
PE3	Outreach program for local students, civic groups	Highway Dept.	Organize and implement round of presentations for local schools and at least one civic group.	Consultant performed stormwater education PowerPoint presentation for Milford Industrial Development Commission (9 members) on September 20, 2006.	Begin education campaign about not feeding waterfowl at Town parks and other bacterial source issues. Include one (1) public presentation.
Revised					

1. Public Education and Outreach cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
PE4	Educational material in library	Highway Dept.	Organize a group of materials regarding stormwater pollution and make available at library.	<p>“Car Care for Cleaner Water” 4-page fact sheet and “Clean Waters Starting in your Home and Yard” 2-page fact sheet: Materials distributed to 6 Milford Schools (Middle School East, Stacy, Memorial, High School, Woodland, and Brookside), as well as Town Library, Wastewater Treatment Plant, Milford Water Co., and Town Hall on June 26, 2006. Electronic files of these materials programmed into Town of Milford web site as of July 2006. In general, the web site receives approximately 11,000 hits per month, but it is unknown how many view the stormwater materials. EPA Poster to inform contractors about the NPDES stormwater permit program was posted in Town Planning and Engineering office. Brochures are available for contractors/developers not aware of the program.</p>	Add to and update collection of materials, with a focus on waterfowl feeding and other bacterial sources.
Revised	<i>Educational materials in Town Hall and other locations</i>	Highway Dept.	Hang posters and have materials available in Town Hall.		

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5																																
PP1	Community cleanup	Highway Dept.	Form volunteer group for annual cleanup. Hold cleanup day and record participants.	Cleanups conducted in 2006 by inmate community service group to pick up litter, and clear brush and debris from local brooks and roadways, as follows: <table><tr><th>Date</th><th>Location</th><th>Scope of Work</th><th>Inmates</th></tr><tr><td>5/30/06</td><td>Oak Tree Dr.</td><td>Cut brush at detention pond</td><td>6</td></tr><tr><td>5/31/06</td><td>Janock Rd. & Sumner St.</td><td>Cut brush at detention pond</td><td>6</td></tr><tr><td>6/1/06</td><td>Central, Beaver, Maple Sts.</td><td>Picked up roadside trash</td><td>6</td></tr><tr><td>6/2/06</td><td>Depot St. at Highway Dept.</td><td>Picked up trash along Charles River</td><td>6</td></tr><tr><td>9/25/06</td><td>Various locations</td><td>Cut brush along roadside</td><td>6</td></tr><tr><td>9/28/06</td><td>Cedar St.</td><td>Picked up roadside trash</td><td>6</td></tr><tr><td>9/29/06</td><td>Asylum St. & Countryside Dr.</td><td>Picked up roadside trash</td><td>5</td></tr></table>	Date	Location	Scope of Work	Inmates	5/30/06	Oak Tree Dr.	Cut brush at detention pond	6	5/31/06	Janock Rd. & Sumner St.	Cut brush at detention pond	6	6/1/06	Central, Beaver, Maple Sts.	Picked up roadside trash	6	6/2/06	Depot St. at Highway Dept.	Picked up trash along Charles River	6	9/25/06	Various locations	Cut brush along roadside	6	9/28/06	Cedar St.	Picked up roadside trash	6	9/29/06	Asylum St. & Countryside Dr.	Picked up roadside trash	5	Continue annual cleanup days to reduce amount of debris/trash along waterways and roadways.
Date	Location	Scope of Work	Inmates																																		
5/30/06	Oak Tree Dr.	Cut brush at detention pond	6																																		
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Revised																																					
PP2	Scrap metal and used motor oil recycling	Highway Dept.	Continue to offer recycling program. Record amount of material collected.	Program is ongoing and maintained by the Board of Health. 2,000 gallons of automotive motor oil collected during calendar year 2006 (consistent with 2,135 gal collected in 2005 and 2,000 gal collected in 2004). 2019 tons of materials recycled in Calendar Year 2006, including 627 tons of scrap metal/white goods.	Continue to offer program and record amounts of materials collected.																																

2. Public Involvement and Participation cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5																																								
PP3	Hazardous waste dropoff days	Highway Dept.	Continue to offer semi-annual dropoff program and record amount of material collected.	<table><tr><td colspan="4">Program is ongoing and maintained by the Board of Health.</td></tr><tr><td>Item</td><td>CY 2004</td><td>CY 2005</td><td>CY 2006</td></tr><tr><td>Auto batteries</td><td>388</td><td>409</td><td>367</td></tr><tr><td>5-gal pails of household batteries</td><td>6</td><td>25</td><td>5</td></tr><tr><td>l.f. of fluorescent bulbs</td><td>315</td><td>285</td><td>375</td></tr><tr><td>C.Y. latex/oil based paint</td><td>15</td><td>18</td><td>15</td></tr><tr><td>Mercury containing devices</td><td>1524</td><td>1497</td><td>505</td></tr><tr><td>lbs electronics</td><td>4100</td><td>3779</td><td>4670</td></tr><tr><td>Propane Tanks</td><td>N/A</td><td>N/A</td><td>388</td></tr><tr><td>Tons Auto Tires</td><td>N/A</td><td>N/A</td><td>2150</td></tr></table> <p>All materials, except for latex/oil based paint, were collected every Thursday through Saturday. Latex/oil based paint was collected all Saturdays in April through November.</p>	Program is ongoing and maintained by the Board of Health.				Item	CY 2004	CY 2005	CY 2006	Auto batteries	388	409	367	5-gal pails of household batteries	6	25	5	l.f. of fluorescent bulbs	315	285	375	C.Y. latex/oil based paint	15	18	15	Mercury containing devices	1524	1497	505	lbs electronics	4100	3779	4670	Propane Tanks	N/A	N/A	388	Tons Auto Tires	N/A	N/A	2150	Continue to offer dropoff program and record amount of material collected.
Program is ongoing and maintained by the Board of Health.																																													
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Auto batteries	388	409	367																																										
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PP4	Public meeting	Highway Dept.	Hold public meeting to present proposed bylaw/ordinances for input prior to implementation by end of PY1.	Task completed in PY3.	Task complete.																																								
Revised			Public meeting may also discuss stormwater pollution prevention.																																										

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
IDD1	Storm Sewer Map	Highway Dept.	Seek Town Meeting funding in PY1. Complete map in PY2.	Outfall mapping completed by consultant August 2004, at cost of \$8,000. A total of 300 outfalls were mapped. 13 additional outfalls have been mapped since that time. Additional storm sewer elements associated with 17 outfall systems mapped including approximately 150 storm sewer manholes, 410 catch basins, and 60,000 feet of storm sewer pipe. GPS mapping was completed for storm drain systems associated with 4 high priority outfalls (#153, #148, #69 and #170).	Task complete (all outfalls). Continue mapping of complete storm drain system.
Revised					
IDD2	IDDE program development, identification of problem areas, correction of issues.	Highway Dept.	Conduct outfall sampling in PY2. Number of illicit discharges to be removed in PY3, 4, 5.	Dry-weather field screening completed by consultant Fall of 2005 and “Dry Weather Outfall Investigation Summary Report” completed November 2005. 303 outfalls were inspected at least once during dry weather. “Top-Down” approach for illicit discharge detection and elimination conducted for 3 of 4 high priority outfalls. PLEASE SEE PART II, SELF-ASSESSMENT FOR DETAILS. Reviewed water quality data provided to the Town by Charles River Watershed Association (CRWA) on September 19, 2006. Communicated with CRWA on December 11, 2006 to understand exact sampling locations, especially in the Charles River at Central Street, where CRWA’s water quality samples indicate high fecal coliform levels. Investigated the Central Street culvert and noted excessive sedimentation.	Investigate the feasibility of removing sedimentation at the Charles River culvert at Central Street and perform camera investigation of culvert. Screen 13 new outfalls during dry weather. Continue IDDE program.
Revised					
IDD3	IDDE program documentation.	Highway Dept.	Submit annual report, including information on IDDE program steps.	Annual report is hereby submitted.	Future PY annual reports will include information on IDDE program tasks.
Revised					

3. Illicit Discharge Detection and Elimination cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
IDD4	Storm drain stenciling program, focusing on drains tributary to ponds and known dumping areas. Program extended to brook drains as feasible.	Highway Dept.	Percentage/number of storm drains stenciled annually. Records of catch basin cleaning showing decreased dumping/pollutants in catch basins.	All Town storm drains (approximately 3,079) were stenciled in PY3. Approximate volume of material removed from catch basins: PY3: 2,460 cubic yards (2710 tons of road sand were purchased by the Town during the previous winter season) PY4: 3,600 cubic yards (1185 tons of road sand were purchased by the Town during the previous winter season)	Task complete. However, paint is fading. Research alternatives to stenciling for marking the storm drains more permanently.
Revised					
IDD5	Regulation prohibiting non-stormwater discharges to municipal system.	Highway Dept.	Development and implementation of regulation during PY2.	Sections on Prohibition of Illegal Discharges, Prohibition of Illicit Connections, and Waste Disposal Prohibitions included in Stormwater Management bylaw, approved at Town Meeting on October 24, 2005. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006. A letter was sent to one private property owner with notification of a potential illicit discharge from a private drain associated with the property, instructing the owner of his responsibility for removing the discharge. The discharge has since been removed. While performing field mapping of the Town of Milford's storm sewer system on November 15, 2006, a likely illegal discharge into the storm sewer system was observed in front of #146 Congress Street. A notification letter has been sent to the property owner. Washwater observed flowing in a watercourse was traced back to its source by staff of the Highway Department. It was found that cleaning staff of a local business were dumping washwater into the storm drain. In September 2006, the cleaning staff were instructed to cease this practice.	Implement bylaw. Work with property owners to remove illicit discharges as needed.
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
CR1	Regulation for erosion/sediment controls, BMPs, construction controls	Highway Dept.	Development and establishment of regulation.	Stormwater Management bylaw requiring stormwater management permit for construction activities disturbing greater than 1 acre approved at Town Meeting on October 24, 2005. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006.	Task complete.
Revised					
CR2	Mechanism for site plan review, inspections, review procedures	Highway Dept.	Establishment of procedures and number of plans reviewed annually.	The Stormwater Management General By-Law, adopted on October 24, 2005, requires a Stormwater Permit for any construction activity disturbing greater than 1 acre of land except for projects that are required to file a Notice of Intent (NOI) with the Milford Conservation Commission. Such NOIs must include a fully executed Stormwater Management Form and projects must be designed in full compliance with DEP's Stormwater Management Policy. Four (4) projects involved land disturbance greater than 1 acre and all four (4) projects filed NOIs with the Conservation Commission and were issued Orders of Conditions. All four (4) projects submitted Operation and Maintenance Plans which are on file in the Town of Milford's Office of Planning and Engineering.	Implement bylaw.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
PCR1	Regulation for BMPs	Highway Dept.	Develop and adopt regulation, measure compliance (# of BMPs, % compliance, etc).	Four (4) projects involved land disturbance greater than 1 acre and all new detention /stormwater basins for these projects will be added to the Town's inventory of basin maintenance at the time of public acceptance of the streets.	Continue to implement bylaw.
Revised					
PCR2	Regulatory mechanism for BMP operation and maintenance (O&M)	Highway Dept.	Regulation development and adoption; maintenance of inspection reports.	Stormwater Management bylaw approved at Town Meeting on October 24, 2005 includes Operation, Maintenance, and Inspection Schedule requirements for privately-owned facilities, and assigns maintenance responsibility. The Stormwater Management bylaw was approved by the Attorney General's Office in letter dated February 9, 2006. Four (4) projects involved land disturbance greater than 1 acre and all four (4) projects submitted Operation and Maintenance Plans which are on file in the Town of Milford's Office of Planning and Engineering.	Continue to implement bylaw.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
MGH1	Street sweeping	Highway Dept.	Continue street sweeping program, note reduction in sediments in catch basins, quantities of material collected.	Street sweeping conducted April – July of 2006: 2,730± cy collected at cost of \$22,474 and 1,040 hrs of labor. Second round of street sweeping conducted August 2006: 540 cy collected at cost of \$3,457 and 160 hours of labor. All accepted streets were swept (120 miles).	Continue program through all permit years.
Revised					
MGH2	Catch basin cleanouts	Highway Dept.	Continue catch basin cleanout program. Record number of catch basins cleaned, sediment collected.	The Town conducted annual catch basin cleanouts in August of 2006 using a rented catch basin cleaner with operator. 3083 catch basins were cleaned and a total of 3,600 cubic yards of material removed. Total cost of \$21,648.	Continue program through all permit years.
Revised					
MGH3	Record keeping/schedule of maintenance	Highway Dept.	Continue to keep listing of regular maintenance activities, schedules, and procedures.	Records added to maintenance file. Examples of records: Work performed on Godfrey, O'Brien, Huckleberry Brooks and/or Charles River by hired contractors including repair of head wall and retaining wall at cost of \$20,000.	Continue to maintain records and update program as needed.
Revised					
MGH4	Recycling and waste disposal program	Highway Dept.	Continue recycling and waste disposal program for municipal operations. Record quantities involved in program.	Program ongoing. 4,329 yds of mulched lawn waste collected in Fall of 2006 from 120 miles of Town streets at cost of \$25,793 and 1,209 hours of labor.	Continue program through all permit years.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations cont'd.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
MGH5	Waste disposal/housekeeping training and practices	Highway Dept.	Continue proper disposal procedures, conduct training, keep logs of material disposal.	Enviro-Safe performed a two and a half-hour class outlining waste disposal and good housekeeping training and practices to 13 highway department employees on April 10, 2007. 150 gallons of oil/water removed from oil/water separator at the Highway Department Garage on June 5, 2006 by Cyn Oil Corporation. 100 gallons were removed on November 2, 2006 by Cyn Oil Corporation. Scrap metal waste was recycled (sold for \$2,520).	Continue program through all permit years.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations cont'd.

BMP ID #	BMP Description	Responsible Dept./ Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
MGH 6	Identification, inspection, maintenance of Town owned BMPs	Highway Dept.	Inspection and maintenance of structures, maintain records.	<ul style="list-style-type: none"> 21 stormwater inlets/outlets cleared of brush, work performed by town forces between 6/1/06 – 1/26/07. New frames/covers installed at one stormwater inlet/outlet (6/1/06). Godfrey/O'Brien Brooks inlet grates checked and cleaned monthly and after large storms (6/8, 7/31, 8/11, 8/21, 8/25, 10/11, 10/18, 10/31, 11/9, 11/21, 12/14, 1/3, 1/4, 1/8). Hospital Brook inlet grates cleaned 6/8 and 10/18. Head wall installed at Depot St. at S. Main St. at Pinz at cost of \$5,000. Retaining wall repaired at Highway Dept. at Charles River at cost of \$15,000. A total of 32 catch basins were repaired and 68 were replaced over the summer of 2006. 150 gallons of oil/water removed from oil/water separator at the Highway Department Garage on June 5, 2006 by Cyn Oil Corporation. 100 gallons were removed on November 2, 2006 by Cyn Oil Corporation. Godfrey Brook channel at S. Main St. - excessive bank vegetation removed and rip-rap placed to prevent erosion. Work performed by 10 Town employees on 7/25 – 7/28. Brush cleared and brooks cleaned at Oliver St., Green St., Thayer St. at Taylor St., Water St., and Carven Rd. using 2 employees each on 7/31/06, 8/7/06, 9/13/06, 1/4/07, and 7/5/06. A guardrail was replaced at Oliver St. on 1/11/07 (2 employees). Routine maintenance of a drainage channel was performed at Hayward St. at Mount Pleasant St. (5/29/06), Front St. (6/1/06) and Vine St. (6/2/06) by a hired contractor at a total cost of \$4,875. Pile of previously dumped yard waste removed from area near outfall at the end of Whip O'Will Lane and rip-rap swale installed to minimize erosion from overland runoff. The drainage system leading to one outfall to the Charles River (downstream of the Milford Pond dam) was re-configured with the installation of a Stormceptor oil and particle separator. Large pile of deposited sediment cleared from Godfrey Brook downstream of Vine Street. 	Perform recommended maintenance activities on detention basins. Continue program.
Revised					

Part IV. Summary of Information Collected and Analyzed

The quantities of materials accepted by the Town's recycling programs are recorded by the Board of Health and have been included in the following section.

Part V. Program Outputs & Accomplishments

Education, Involvement, and Training

Stormwater education materials collected and available at library	(y/n)	YES
Clean-up days held	(#)	7
Household Hazardous Waste Recycling		
▪ material collected (automotive waste oil)	(gal)	2000
▪ material collected (household paint)	(gal)	3030
▪ annual recycling (January 2005 - December 2005 (inclusive))	(tons)	2019

Legal/Regulatory

	In Place Prior to Phase II	Existing Regs Reviewed	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control				X
▪ Post-Development Stormwater Management				X
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control	X (partly)			X
▪ Post-Development Stormwater Management				X

Mapping and Illicit Discharges

Number of outfalls mapped to date	(#)	313
Estimated or actual number of outfalls	(#)	313
Mapping/Survey method(s)	type	GPS and CAD/GIS
Outfalls inspected/screened during dry weather	(#)	303 (97%)
Estimated % of population on sewer	(%)	80
Estimated % of population on septic systems	(%)	20
Outfalls identified for further investigation	(#)	22 (7%)
Outfall drainage systems mapped	(#)	17 (5%)
Illicit discharges traced	(#)	4
Illicit discharges removed	(#)	2

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1
Total number of structures cleaned	(#)	3083
Total amount of material removed from structures	(cubic yards)	3600
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		registered landfill
Disposal of yard waste		Composted and used by Parks and Highway Dept.
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	2
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	2
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	registered landfill

Anti-/De-Icing products	material	NaCl and limited CaCl ₂
Salt pile(s) covered in storage shed(s)	(y/n)	Yes